

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

**JOHN WILLIAMS, on behalf of himself  
and all others similarly situated,**

**Plaintiff,**

**v.**

**TIME WARNER CABLE INC., and  
ABC COMPANIES, 1-100,**

**Defendants.**

**Case No. 1:11-cv-00647-SAS-SKB**

**Judge: S. Arthur Spiegel**

**Magistrate Judge: Stephanie K. Bowman**

---

**DEFENDANT TIME WARNER CABLE INC.'S MOTION TO COMPEL  
ARBITRATION AND DISMISS AMENDED COMPLAINT OR, IN THE  
ALTERNATIVE, STAY THIS ACTION PENDING ARBITRATION**

Pursuant to 9 U.S.C. §§ 2, 3, and 4 and Rules 12(b)(1), (3), and (6) of the Federal Rules of Civil Procedure, and for the reasons set forth in the accompanying Memorandum of Law in Support, Defendant Time Warner Cable Inc. ("Time Warner Cable") respectfully moves the Court to compel arbitration and dismiss Plaintiff's Complaint to enforce the parties' arbitration agreement or, in the alternative, stay this action pending arbitration.

Dated: January 13, 2012

Respectfully submitted,

s/Jeffrey J. Jones

---

Jeffrey J. Jones (0030059)

*Trial Attorney*

jjjones@jonesday.com

Erik J. Clark (0078732)

ejclark@jonesday.com

JONES DAY

325 John H. McConnell Boulevard, Suite 600

Columbus, OH 43215-2673

Telephone: +1.614.469.3939

Facsimile: +1.614.461.4198

*Attorneys for Defendant*

*Time Warner Cable Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 13, 2012, a true and correct copy of the foregoing was sent via email and electronically filed with the Clerk of the United States District Court of the Southern District of Ohio, using the CM/ECF system, which will send notification of such filing to counsel of record at the addresses that they have provided to the Court.

Jeffrey S. Goldenberg  
Todd B. Naylor  
Robert Sherwood  
Goldenberg Schneider, LPA  
35 East Seventh Street, Suite 600  
Cincinnati, OH 45202-2012  
jgoldenberg@gs-legal.com  
tnaylor@gs-legal.com  
rsherwood@gs-legal.com

Christian A. Jenkins  
Minnillo & Jenkins, Co. L.P.A.  
2712 Observatory Avenue  
Cincinnati, OH 45202  
cjenkins@minnillojenkins.com

*Attorneys for Plaintiff*

s/Jeffrey J. Jones

---

One of the Attorneys for Defendant  
Time Warner Cable Inc.